

Kentucky Power Company
KPSC Case No. 2024-00343
Commission Staff's Second Set of Data Requests
Dated December 30, 2024

DATA REQUEST

KPSC 2_1 Provide a list of the thermal violations related to the risers at the Bellefonte Station for calendar years 2019 through 2024.

RESPONSE

There have been no thermal violations identified on the risers at the Bellefonte Station for the years 2019 through 2024 as defined by AEP and PJM's planning criteria. The planning criteria defined violations are based on expected conditions in 2026. The Proposed Project would prevent these thermal violations from occurring in the future.

Witness: Nicolas C. Koehler

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DATA REQUEST

KPSC 2_2 Confirm that the Kentucky Power costs of this project will be allocated to AEP companies through PJM Interconnection, LLC. If not confirmed, explain.

RESPONSE

Confirmed in part. The allocation of the costs of this Project is a multistep process, which includes an initial allocation by PJM under the Open Access Transmission Tariff (“OATT”) to the AEP East zone, and then a reallocation under the AEP East Transmission Agreement to each operating company that is a party to that agreement. The Project will be included in the total OATT Expense that is paid collectively by all the wholesale transmission customers of the PJM transmission system. PJM then allocates the total PJM OATT expense among the transmission zones, including the AEP East zone, based on cost allocation rules included in the PJM OATT. Then, PJM allocates the zonal costs to each load serving entity (“LSE”) within the AEP East zone, including Kentucky Power and the other AEP East operating companies, based on each LSE’s contribution to the single highest hourly peak of the zone in a 12-month period, or in other words, on a 1-coincident peak (“CP”) basis. The total AEP East Operating Company zonal cost is then reallocated under the AEP East Transmission Agreement to each operating company that is a party to that agreement, including Kentucky Power, on a 12-CP basis.

Witness: Tanner S. Wolfram

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DATA REQUEST

KPSC 2_3 Refer to Case No. 2024-00017 as discussed at the informal conference held on December 17, 2024. Provide the remaining amount of approved indebtedness not yet utilized by Kentucky Power.

RESPONSE

As of December 31, 2024, the Company had \$150 million remaining on its approved long-term debt authority. On January 2, 2025, the Company issued a \$150 million term loan to repay some of its elevated short-term debt balance used to fund the Company's operations until its pending securitization bonds are issued. The Company anticipates filing for additional long-term debt authority in the near future.

Witness: Tanner S. Wolfram

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DATA REQUEST

KPSC 2_4 Provide the number of customers, by customer class, affected by any outages at the Bellefonte Station.

RESPONSE

There have not been any outages caused by equipment located at Bellefonte Station over the past five years (see the Company's response to KPSC 1-15). Therefore, no customers have been impacted by outages at Bellefonte from 2019 to 2024.

Nonetheless, the main driver for the Project is baseline planning needs (i.e. to prevent thermal violations from occurring in the future). The supplemental components of the proposed Project are proposed to be done at the same time, in part, to maximize efficiency of construction resources and planned outages necessary. In addition, the supplemental work also will address assets that are becoming increasingly expensive to maintain, and which would also be more expensive to replace if they were to fail rather than as a proactive replacement based on their age, condition, and risk as proposed now. See Koehler Testimony Page 3 Lines 6-19 for a summary of the need for the supplemental work.

Please see the below table for outages and associated customer impacts on associated facilities (circuits) served out of Bellefonte Station from 2019 to 2024. Any outages that were initially provided in response to KPSC 1-15 but that did not have direct impact on Kentucky customers were omitted from the below table. CI refers to the total number of customers interrupted because of the subject outage, either directly served by Transmission (T) or served by Distribution (D).

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Circuit Outage Cause Summary					
Bellefonte – Coalton 69kV Circuit (01/01/2019 – 11/30/2024)					
Date	Cause	Duration (Hours)	T CI	D CI	Impacted Station
2/11/21	Vegetation Fall-in (Outside ROW)	14.33	0	347	Princess
Circuit Outage Cause Summary					
Ashland – Bellefonte 69kV Circuit (01/01/2019 – 11/30/2024)					
Date	Cause	Duration (Hours)	T CI	D CI	Impacted Station
2/28/21	Human Error – Incorrect Physical Execution	1.77	1	0	Mansbach Metal WO
6/30/21	Unknown	514.48	1	0	Mansbach Metal WO

Witness: Nicolas C. Koehler

VERIFICATION

The undersigned, Nicolas C. Koehler, being duly sworn, deposes and says he is the Director of East Transmission Planning for American Electric Power, that he has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of his information, knowledge, and belief.

Signed by:
Nicolas C. Koehler
3979C8E21905430...
Nicolas C. Koehler

Commonwealth of Kentucky)
)
County of Boyd)

Case No. 2024-00343

Subscribed and sworn to before me, a Notary Public in and before said County
and State, by Nicolas C. Koehler, on 1/9/2025 | 9:00 AM EST.

Signed by:
Michelle Caldwell
E9B1BC7AC31F421...
Notary Public

MARILYN MICHELLE CALDWELL
ONLINE NOTARY PUBLIC
COMMONWEALTH OF KENTUCKY
Commission #KYNP71841
My Commission Expires 5/5/2027

My Commission Expires 05/05/2027

Notary ID Number KYNP71841

Certificate Of Completion

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Certificate Pages: 5	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelopeld Stamping: Disabled	Michelle Caldwell
Time Zone: (UTC-08:00) Pacific Time (US & Canada)	mmcaldwell@aep.com
	IP Address: 167.239.221.107

Record Tracking

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Signer Events

Nicolas C. Koehler
 nckoehler@aep.com
 Security Level: Notarized Signing (Notary: Michelle Caldwell)

Signature

Signed by:

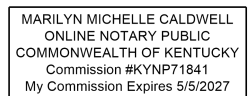
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Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Michelle Caldwell mmcaldwell@aep.com Regulatory Case Coordinator AEP Kentucky Power Notary for Nicolas C. Koehler (nckoehler@aep.com)	 <p>Using IP Address: 167.239.221.101</p> <p>Signature Provider Location: https://ssasign.docusign.net/sca/1940</p>	Sent: 1/3/2025 12:55:10 PM Viewed: 1/9/2025 8:59:04 AM Signed: 1/9/2025 9:00:45 AM
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Envelope Summary Events	Status	Timestamps
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Payment Events	Status	Timestamps
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Initials: 0

Michelle Caldwell

AutoNav: Enabled

mmcaldwell@aep.com

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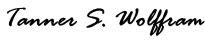
Signer Events

Tanner S. Wolfram

tswolfram@aep.com

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Signature

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Signature Adoption: Pre-selected Style

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Intermediary Delivery Events

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Certified Delivery Events

Status

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Carbon Copy Events

Status

Timestamp

Witness Events

Signature

Timestamp

Notary Events

Signature

Timestamp

Michelle Caldwell

mmcaldwell@aep.com

Regulatory Case Coordinator

AEP Kentucky Power

Notary for Tanner S. Wolfram

(tswolfram@aep.com)

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Signature Issuer: DocuSign Cloud Signing CA-Identity

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 ONLINE NOTARY PUBLIC
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 Commission #KYNP71841
 My Commission Expires 5/5/2027

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Electronic Record and Signature Disclosure